

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

THELMA JONES, PRIYIA LACEY, FAISA
ABDI, ALI ALI, RUKIYA HUSSEIN, LUCIA
PORRAS, DAVID TROTTER-FORD, AND
SOMALI COMMUNITY RESETTLEMENT
SERVICES, INC.,

Case: 18-cv-1643 (JRT/HB)

Plaintiffs,

v.

CITY OF FARIBAULT,

Defendant.

DECLARATION OF SCOTT J. RIGGS

I, **SCOTT J. RIGGS**, do hereby depose and state as follows:

1. I am a shareholder at the law firm of Kennedy and Graven,
Chartered, where I serve as attorney for the City of Faribault and the Faribault
Housing and Redevelopment Authority.

2. On May 1, 2014, I received an electronic communication from Dave
Mathews, then-Building Inspector for my client the City of Faribault, requesting
legal advice regarding [REDACTED]
[REDACTED]

3. I understood this communication to be transmitted to me and my
colleague Melissa Manderschied in our capacities as the attorneys for the City,
because [REDACTED]

[REDACTED]

4. On March 28, 2017, I received an electronic communication from Deanna Kuennen, Community and Economic Development Director for my client the City of Faribault, regarding [REDACTED]

[REDACTED]

5. I understood this communication to be transmitted to me in my capacity as the City attorney, because [REDACTED]

[REDACTED]

6. This communication was not disseminated to anyone inside or outside of the City who did not need to know its contents. While then-City Engineer Tim Murray was included on the communication, his inclusion was necessitated by [REDACTED]

[REDACTED]

[REDACTED]

7. On September 29, 2017, I received an electronic communication from Kim Clausen [REDACTED]

[REDACTED]

8. I understood this communication to be transmitted to me in my capacity as the attorney for the Faribault Housing and Redevelopment Authority, because [REDACTED]

[REDACTED]

9. I reached out to Ms. Clausen via telephone to discuss the issue and directed my legal secretary Jean Short to provide Ms. Clausen with a written summary of legal advice and opinions.

10. I directed Ms. Short to provide this written summary [REDACTED]

[REDACTED]

FURTHER THIS DECLARANT SAYETH NOT.

STATE OF MINNESOTA)

): SS

COUNTY OF HENNEPIN)

s/Scott J. Riggs

Scott J. Riggs